

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

JOSEPH ROSALINA, ESQ SPECIAL)	CASE NO. 1:23-cv-02147
ADMINISTRATOR OF THE ESTATE OF)	
MARK L. TURNER, DECEASED,)	JUDGE BRIDGET MEEHAN
)	BRENNAN
Plaintiff,)	
vs.)	
)	
THE METROHEALTH SYSTEM, et al.,)	<u>PLAINTIFF'S PRELIMINARY</u>
)	<u>ESTIMATE AND/OR BUDGET OF</u>
Defendants.)	<u>COSTS AND FEES</u>
)	

The following is a preliminary estimate and/or budget of Plaintiff's costs and attorney fees anticipated to be the subject of a claim in this case. These

<u>Attorneys' Fees</u>		<u>Costs</u>	
Preliminary Investigation & Filing Complaint	<u>\$10,000.00</u>	Depositions	<u>\$30,000.00</u>
Procedural Motions Practice	<u>\$5,000.00</u>	Experts	<u>\$30,000.00</u>
Discovery	<u>\$100,000.00</u>	Witness Fees	<u>\$2,500</u>
Dispositive Motions Practice	<u>\$50,000.00</u>	Other	<u>\$10,000.00</u>
Settlement Negotiations	<u>\$5,000.00</u>		
Trial	<u>\$100,000.00</u>		
<u>TOTAL FEES</u>	<u>\$360,000.00</u>	<u>TOTAL COSTS</u>	<u>\$72,500.00</u>

/s/ Kevin C. Hulick

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of March 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record and may be obtained through the Court's CM/ECF Systems.

/s/ Kevin C. Hulick

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